

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KYRA LYNCH,

Plaintiff,

-against-

THE CITY OF NEW YORK, POLICE COMMISSIONER
RAYMOND KELLY, COMMANDING OFFICER
COREY PEGUES, JOHN DOE POLICE OFFICERS 1-10,
JANE DOE POLICE OFFICER,

Defendants.

**NOTICE OF MOTION
FOR SUMMARY
JUDGMENT BASED ON
QUALIFIED IMMUNITY**

07 Civ. 10446 (CM)(MHD)

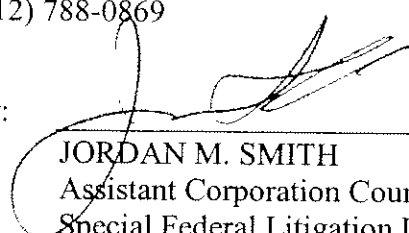
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PLEASE TAKE NOTICE that, pursuant to the individual practices of the Honorable Colleen McMahon, defendants Police Commissioner Raymond Kelly and Corey Pegues will move this Court before the Honorable Colleen McMahon, United States District Judge, at the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting summary judgment to defendants Raymond Kelly and Corey Pegues on the issue of qualified immunity and dismissing the complaint, together with such other relief as the Court may deem just and proper, on the grounds that there are no material issues of fact that warrant a trial on the claims.

Dated: New York, New York
January 22, 2008

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By:



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